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Office of Air, Waste & Toxics

July 15, 2014

Ms. Jan Palumbo (AWT-121)  
United States EPA, Region 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

**Subject: July 2014 Progress Report  
J.H. BAXTER ARLINGTON FACILITY  
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the July 2014 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from June 15, 2014, to July 15, 2014.

#### **SIGNIFICANT DEVELOPMENTS THIS PERIOD**

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- The Remedial Action Pilot System continued to operate during the reporting period.
- Baxter has been revising the formats for the operations and monitoring reports, and preparing quarterly reports for internal review.
- On June 17, 2014, Baxter submitted the Revised Third Quarter 2013 Operations and Monitoring Report.
- On July 15, 2014, Baxter submitted the Fourth Quarter 2013 Operations and Monitoring Report.

#### **ANTICIPATED DEVELOPMENTS NEXT PERIOD**

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter continues to evaluate soil and groundwater data generated from the Source Area Investigation.
- Baxter will submit the First Quarter 2014 Operations and Monitoring Report and an updated schedule for completion of the Treatability Study.



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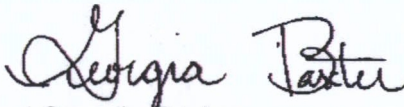
## OTHER INFORMATION

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- Baxter has no other information to report.

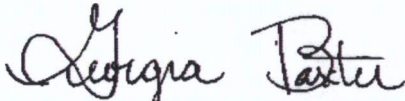
## CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:   
Name: Georgia Baxter  
Title: Chief Executive Officer  
Date: July 15, 2014

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,

  
Georgia Baxter  
Chief Executive Officer

cc: Jeanne Tran, Ecology  
Jamie Hillery, Stella-Jones Corp.  
RueAnn Thomas, Nattura Group  
J. Stephen Barnett, AMEC

